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13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION
16

17 UNITED STATES OF AMERICA,

18 Plaintiff,

19 vs.

20 PACIFIC GAS AND ELECTRIC
21 COMPANY,

22 Defendant.
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No.: CR-14-0175-WHA

DECLARATION OF STEVEN M.
CAMPORA IN SUPPORT OF SUBMISSION
OF ATTORNEYS PITRE AND CAMPORA
IN RESPONSE TO ORDER DATED
JANUARY 30, 2019

1 I, STEVEN M. CAMPORA, declare:

2 1. I am an attorney with the Law Firm of Dreyer, Babich, Buccola, Wood, Campora LLP.
3 I have been involved with litigation, on behalf of fire and explosion victims and against Pacific Gas
4 and Electric Company, since 2008. I have taken the deposition of more than 200 Pacific Gas and
5 Electric Company officers and employees since 2008. I participated in the San Bruno Explosion
6 litigation, the derivative action against the Board of Directors, the Butte Fire JCCP, the CA North
7 Bay Fires JCCP and the Camp Fire litigation. I was a Liaison Counsel in the Butte Fire JCCP and
8 I am a member of the Plaintiffs' Executive Committee in the CA North Bay Fires JCCP.

9 2. I have reviewed literally thousands of Pacific Gas and Electric Company documents
10 produced in litigation and I have deposed at least 90 witnesses on Pacific Gas and Electric Company
11 vegetation management practices.

12 3. I took the Deposition of Ms. Janaize Markland. A true and correct copy of portions of
13 her testimony and exhibits from her deposition are attached hereto as Exhibit A. In that deposition
14 and in her prepared testimony to the CPUC, Ms. Markland made specific reference to the "risk
15 tolerance" accepted by Pacific Gas and Electric Company. See for example, page 2-12 of Exhibit
16 2034 to her deposition and pages 50 through 63 of her deposition.

17 4. During the course of discovery and in public statements, Pacific Gas and Electric
18 Company has made various references to the number of miles of distribution line. Those numbers
19 range anywhere from 81,000 miles to more than 115,000 miles of line. In January of 2019, I
20 downloaded information from Pacific Gas and Electric Company's webpage, which indicated that
21 there were 81,000 miles of above ground distribution lines, 26,000 miles of underground distribution
22 lines and 18,000 miles of overhead transmission lines. A true and correct copy of the pages I
23 downloaded is attached hereto as Exhibit B. Based on the numbers provided by Pacific Gas and
24 Electric Company and Ms. Markland's statement that Pacific Gas and Electric Company accepted
25 a risk tolerance of 17 tree related outages per 1000 miles of line, the outages per year would range
26 from 1,377 to 1,955.

27 5. Attached hereto as Exhibit C is a true and correct copy of a portion of a Session D Risk
28 Assessment produced by Pacific Gas and Electric Company. PG&E witnesses have identified

1 Session D as PG&E's evaluation of the risks posed by various lines of business, including Electric
2 Operations. One of the risks evaluated is wildfire. The pages attached as Exhibit C reference
3 PG&E's understanding that ignition data showed "1 to 2 large fires per year (300 acres or greater)."
4 More importantly, the document shows that PG&E was aware that CalFire believed "~5% to 10%
5 of large fires become catastrophic fires (P95 events)."

6 6. Exhibit D is a true and correct copy of the Butte Fire data available on the Cal Fire
7 website.

8 7. A true and correct copy of portions of the Deposition of Charles Filmer and his report,
9 dated February 7, 2013 (Exhibit 829 to his deposition), are attached hereto as Exhibit E.

10 8. A true and correct copy of the Draft Final Deposition of Brian Biancardi, with the
11 referenced exhibits, is attached hereto as Exhibit F. Under the protective order for that matter,
12 PG&E would have a number of days to review the deposition and identify any confidential
13 information before the deposition became final. Due to the bankruptcy stay, that process stopped.
14 However, I requested of Mr. Orsini and Ms. Dyer that they consent to our filing of this deposition
15 and the exhibits and they did so consent.

16 9. Attached hereto as Exhibit G is a true and correct copy of a portion of the deposition of
17 Stephen Tankersley. Mr. Tankersley oversaw the vegetation management department for PG&E,
18 until shortly before the Butte Fire.

19 10. Attached hereto as Exhibit H are true and correct portions of the deposition of Mr. Eric
20 Oldford and relevant exhibits.

21 11. Should the Court desire the complete portion of any deposition or exhibit attached
22 hereto, I can provide them to the Court.

23 I declare under penalty of perjury that the foregoing is true and correct of my own personal
24 knowledge. Executed this 4th day of February 2019 at Sacramento, California.

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Steven M. Campora